



## Defense of Place

May 22, 2013

California State Fish and Wildlife Commission  
Los Angeles, California

I submit the following comments on behalf of Defense of Place.

Defense of Place is the California-based, national organization established as a project of the Resource Renewal Institute in 1997. The Institute's founder and president is Huey Johnson, founder of the Trust for Public Land and California Resource Agency secretary from 1978 to 1982.

Mr. Johnson created Defense of Place to sustain parklands and open spaces nationwide whose protective deeds are contravened for development or predatory changes in use. The settings and purposes vary, but inevitably the explanations for the breaches in protection carry coded words meant to mollify citizens when their public asset is bartered away. For instance, "Interpretive Centers" have become the Orwellian substitute for office buildings and administrative headquarters, and PowerPoint diagrams of facility footprints artfully mask the reality of the infrastructure and peripheral impacts. In addition, the guardians of protected lands regularly excuse the land surrender with the familiar, "It is already degraded land."

It dismays us that an egregious example of such a barter of land held in the public trust seems to have occurred in our home state this past January with the signing of the MOU between the California Department of Fish and Wildlife and the Annenberg Foundation for the development and repurposing of significant areas of the Ballona Wetlands. We cannot fathom how the Department ignores its obligations to honor the deed restrictions that rescued the wetlands a decade ago through a \$139 million bond measure in partnership with the Trust for Public Land by accepting a \$50 million project whose brute size and intent ultimately have nothing to do with the true nature of the Ballona Wetlands and its wildlife habitat.

From the Defense of Place perspective, the MOU between the Foundation and DFW represents a clear contravention of the deed that rescued the Wetlands and promised a public process to mend the natural ecology of the 600-acre preserve.

**Defense of Place** ♪ A Project of Resource Renewal Institute  
187 E. Blithedale Avenue, Mill Valley, CA 94941 ♪  
415. 515. 1616

The Annenberg Foundation's proposal masks the reality of a development whose facts remain elusive. Such was the case in Rancho Palos Verdes for that city's Lower Point Vicente Park when it took years of persistent inquiries to finally reveal the realities of a proposed Annenberg project: an out-of-scale "interpretive center" that featured a domestic animal component. Ultimately, courageous National park Service principals stepped in to honor the public codes protecting that park, and the Foundation withdrew its application . . . only to materialize at Ballona with the welcome of the Department of Fish and Wildlife.

We will continue to press Fish and Wildlife, other local and federal agencies, and presumed conservation organizations to honor their legal, ethical and environmental obligations to the Ballona Wetlands.

Defense of Place respectfully requests that this Commission dissect every facet of the MOU between the Department – which actually should be serving as Trustee of the Ballona Wetlands for all Californians – and the Annenberg Foundation to determine the integrity of the transaction and truly calculate the environmental and ecological consequences should the project proceed.

Thank you.